

EXHIBIT 83

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL)
PRESCRIPTION) MDL No. 2804
OPIATE LITIGATION)
_____) Case No.
) 1:17-MD-2804
)
THIS DOCUMENT RELATES) Hon. Dan A.
TO ALL CASES) Polster

TUESDAY, JANUARY 15, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

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Videotaped deposition of Karen
Harper, held at the offices of STINSON
LEONARD STREET LLP, 7700 Forsyth Boulevard,
Suite 1000, St. Louis, Missouri, commencing
at 9:09 a.m., on the above date, before
Carrie A. Campbell, Registered Diplomate
Reporter and Certified Realtime Reporter.

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GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

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1 Q. Okay. Do you have an 09:23:54
2 approximate recollection of how much you 09:23:55
3 made? 09:23:57
4 A. No, sir. 09:23:57
5 Q. Okay. Do you recall if it was 09:23:59
6 \$75,000 or more or above? 09:24:01
7 A. No, sir, I don't recall. 09:24:03
8 Q. Okay. Do you know what your 09:24:04
9 salary is currently? 09:24:09
10 A. Yes. 09:24:10
11 Q. Okay. And you're currently 09:24:13
12 director of controlled substance compliance, 09:24:15
13 correct? 09:24:18
14 A. Yes. 09:24:19
15 Q. And what is your salary 09:24:19
16 currently? 09:24:21
17 A. It's -- I'm going to give you 09:24:21
18 two numbers because I get that mixed up as 09:24:24
19 well, I'm sorry. It's either [REDACTED] or 09:24:27
20 [REDACTED] per year. 09:24:31
21 Q. [REDACTED] 09:24:32
22 A. [REDACTED] 09:24:34
23 Q. [REDACTED] 09:24:35
24 [REDACTED] 09:24:39
25 A. [REDACTED] 09:24:40

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1 [REDACTED]. 09:24:42
2 Q. And when did you start 09:24:42
3 [REDACTED] 09:24:44
4 A. I don't recall the year. 09:24:44
5 Q. Okay. And do you have any 09:24:45
6 other -- do you have a retirement package at 09:24:49
7 all? 09:24:51
8 A. Yes. 09:24:52
9 Q. Okay. And what does that 09:24:53
10 consist of? 09:24:54
11 A. It's 401(k). 09:24:55
12 Q. Okay. Other than the 401(k) 09:24:56
13 and [REDACTED], do you 09:24:58
14 have any other additional compensation in 09:25:01
15 addition to your salary? 09:25:04
16 A. Yes. 09:25:05
17 Q. And what does that consist of? 09:25:07
18 A. A bonus, an annual bonus. 09:25:08
19 Q. Okay. And approximately how 09:25:10
20 much is that? 09:25:11
21 A. It's -- it's a percent of the 09:25:11
22 salary based upon the performance of the 09:25:14
23 company. 09:25:17
24 Q. Okay. And what's the 09:25:17
25 approximate percentage that you received last 09:25:18

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1 year? 09:25:20
2 A. It's [REDACTED] percent. 09:25:20
3 Q. Okay. And has that -- over the 09:25:23
4 time that you've either been senior manager 09:25:27
5 or director of controlled substance 09:25:28
6 compliance, has it been that approximate 09:25:30
7 percentage? 09:25:32
8 A. Yes. 09:25:32
9 Q. Okay. Great. 09:25:34
10 Ms. Harper, have you reviewed 09:25:35
11 any court documents or pleadings in this 09:25:39
12 case? 09:25:42
13 A. I'm not certain. 09:25:42
14 Q. Okay. Are you aware that 09:25:46
15 there's a case currently pending in Ohio, 09:25:49
16 generally titled the national opioid 09:25:54
17 litigation? 09:25:56
18 A. Yes. 09:25:56
19 Q. And you're aware that there are 09:25:57
20 approximately 1500 jurisdictions that have 09:25:58
21 filed suit against various manufacturers, 09:26:02
22 distributors and retail pharmacies of 09:26:07
23 prescription opioids? 09:26:08
24 A. Yes. 09:26:08
25 Q. Okay. And are you aware that 09:26:08

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1 these jurisdictions have alleged that these 09:26:09
2 entities are responsible for the opioid 09:26:12
3 crisis? 09:26:14
4 A. Yes. 09:26:15
5 Q. Okay. By the way, are you 09:26:16
6 aware -- strike that. 09:26:20
7 Are you generally aware that 09:26:20
8 these jurisdictions are alleging that these 09:26:25
9 entities should be responsible for the costs 09:26:28
10 that these entities have incurred as a result 09:26:30
11 of responding to the opioid crisis? 09:26:33
12 A. Yes, in general. 09:26:35
13 Q. Okay. And are you aware of any 09:26:36
14 complaints that have actually been filed 09:26:39
15 against your company? 09:26:42
16 A. No. 09:26:43
17 Q. Okay. So you haven't read any 09:26:46
18 of the complaints that have been filed 09:26:47
19 against Mallinckrodt? 09:26:50
20 A. I've read pieces of the MDL, 09:26:51
21 but nothing specific to Mallinckrodt. 09:26:55
22 Q. Okay. When you say "pieces of 09:26:56
23 the MDL," what do you mean? 09:26:59
24 A. The multi-district litigation. 09:27:01
25 Q. And particularly when you say 09:27:03

<p style="text-align: right;">Page 34</p> <p>1 "pieces," I'm just trying to get an 09:27:04</p> <p>2 understanding of what you've reviewed. 09:27:06</p> <p>3 A. So we receive a pharma news 09:27:07</p> <p>4 brief every single day, and so there will be 09:27:10</p> <p>5 excerpts from the various matters related to 09:27:13</p> <p>6 the MDL, Judge Polster's rulings, et cetera. 09:27:16</p> <p>7 Q. I see. 09:27:20</p> <p>8 So in other words, you're 09:27:20</p> <p>9 getting and receiving and reviewing these 09:27:22</p> <p>10 news updates about the MDL? 09:27:26</p> <p>11 A. Correct. 09:27:28</p> <p>12 Q. Okay. Great. 09:27:29</p> <p>13 Ms. Harper, do you agree that 09:27:30</p> <p>14 there's an opioid epidemic in this country? 09:27:35</p> <p>15 MR. O'CONNOR: Object to form. 09:27:37</p> <p>16 THE WITNESS: Yes, I do. 09:27:38</p> <p>17 QUESTIONS BY MR. KO: 09:27:39</p> <p>18 Q. Okay. And are you aware that 09:27:41</p> <p>19 there's been an opioid epidemic in this 09:27:43</p> <p>20 country for quite some time? 09:27:45</p> <p>21 MR. O'CONNOR: Object to form. 09:27:47</p> <p>22 THE WITNESS: I don't know, 09:27:47</p> <p>23 sir, what you mean by "quite some 09:27:50</p> <p>24 time." 09:27:51</p> <p>25 Can you -- I don't know. 09:27:52</p>	<p style="text-align: right;">Page 36</p> <p>1 THE WITNESS: That is not 09:28:44</p> <p>2 the sta -- pardon me, the statistic I 09:28:46</p> <p>3 have heard. 09:28:48</p> <p>4 QUESTIONS BY MR. KO: 09:28:48</p> <p>5 Q. Okay. What is the statistic 09:28:49</p> <p>6 that you have heard? 09:28:50</p> <p>7 A. That we're in the top five -- 09:28:50</p> <p>8 Q. Okay. 09:28:50</p> <p>9 A. -- of the share of generic 09:28:53</p> <p>10 suppliers. 09:28:55</p> <p>11 Q. Okay. And generic suppliers of 09:28:55</p> <p>12 prescription opioids in particular, correct? 09:28:58</p> <p>13 A. Yes. 09:28:59</p> <p>14 Q. Okay. And currently, do you 09:29:00</p> <p>15 understand that Mallinckrodt has the number 09:29:05</p> <p>16 one market share of generic prescription 09:29:07</p> <p>17 opioids? 09:29:10</p> <p>18 MR. O'CONNOR: Object to form. 09:29:10</p> <p>19 THE WITNESS: I don't -- I'm 09:29:11</p> <p>20 sorry. I don't know. I don't know 09:29:12</p> <p>21 our current market position. 09:29:13</p> <p>22 QUESTIONS BY MR. KO: 09:29:14</p> <p>23 Q. Okay. During your time as 09:29:14</p> <p>24 director or senior manager of controlled 09:29:18</p> <p>25 substance compliance, have you ever inquired 09:29:21</p>
<p style="text-align: right;">Page 35</p> <p>1 QUESTIONS BY MR. KO: 09:27:53</p> <p>2 Q. When did you first start 09:27:54</p> <p>3 believing that there was an opioid epidemic 09:27:57</p> <p>4 in this country? 09:28:02</p> <p>5 MR. O'CONNOR: Object to form. 09:28:03</p> <p>6 THE WITNESS: Approximately 09:28:04</p> <p>7 mid-2000s. 09:28:05</p> <p>8 QUESTIONS BY MR. KO: 09:28:06</p> <p>9 Q. Mid-2000s? 09:28:07</p> <p>10 A. Yes, sir. 09:28:08</p> <p>11 Q. Okay. Are you familiar with 09:28:08</p> <p>12 Mallinckrodt's market share of prescription 09:28:10</p> <p>13 opioids? 09:28:13</p> <p>14 A. On some products, yes. 09:28:13</p> <p>15 Q. Okay. With respect to the 09:28:18</p> <p>16 generic product line of Mallinckrodt, are you 09:28:20</p> <p>17 aware of Mallinckrodt's market share in the 09:28:24</p> <p>18 generic line of business? 09:28:27</p> <p>19 A. Not overall, no, sir. 09:28:29</p> <p>20 Q. Okay. Are you aware that 09:28:31</p> <p>21 Mallinckrodt has been either the number one 09:28:34</p> <p>22 or number two in terms of market share 09:28:36</p> <p>23 generic manufacturer of prescription opioids 09:28:40</p> <p>24 for the last 20 or so years? 09:28:42</p> <p>25 MR. O'CONNOR: Object to form. 09:28:43</p>	<p style="text-align: right;">Page 37</p> <p>1 as to the market share of Mallinckrodt with 09:29:23</p> <p>2 respect to prescription opioids? 09:29:26</p> <p>3 A. On certain specific drug 09:29:28</p> <p>4 substances, yes. 09:29:31</p> <p>5 Q. And which specific drug 09:29:32</p> <p>6 substances? 09:29:34</p> <p>7 A. So I'll use the example 09:29:34</p> <p>8 methylphenidate. When we're applying for 09:29:40</p> <p>9 quota, if there is an intent or if we have a 09:29:43</p> <p>10 belief that we will grow our market share, I 09:29:46</p> <p>11 need to learn the existing market share that 09:29:48</p> <p>12 Mallinckrodt holds. 09:29:51</p> <p>13 Q. Okay. And when over the last 09:29:52</p> <p>14 20 or so years have you inquired into that? 09:29:57</p> <p>15 Has that been inquiries that 09:30:03</p> <p>16 you've made on a fairly regular basis? 09:30:04</p> <p>17 MR. O'CONNOR: Object to form. 09:30:07</p> <p>18 THE WITNESS: Yes, in 09:30:07</p> <p>19 coordination with quota requests to 09:30:08</p> <p>20 DEA, yes. 09:30:09</p> <p>21 QUESTIONS BY MR. KO: 09:30:10</p> <p>22 Q. And those quota requests on an 09:30:10</p> <p>23 annual basis, correct? 09:30:13</p> <p>24 A. Quota is granted on an annual 09:30:13</p> <p>25 basis, but the requests are an iterative 09:30:16</p>

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<p>1 process throughout a calendar year. 09:30:19</p> <p>2 Q. Okay. And so you would say 09:30:20</p> <p>3 that you have regularly -- I just want to 09:30:22</p> <p>4 make sure I understand when you -- when you 09:30:25</p> <p>5 have inquired into understanding 09:30:28</p> <p>6 Mallinckrodt's market share, and you've said 09:30:30</p> <p>7 on a fairly consistent basis, correct? 09:30:32</p> <p>8 A. Yes. 09:30:34</p> <p>9 Q. Okay. And consistent means 09:30:36</p> <p>10 throughout the year, as you've described, in 09:30:40</p> <p>11 connection with issues when dealing with 09:30:42</p> <p>12 quota requests to the DEA? 09:30:45</p> <p>13 MR. O'CONNOR: Object to form. 09:30:47</p> <p>14 THE WITNESS: Yes, throughout 09:30:47</p> <p>15 the year, but on certain drug 09:30:49</p> <p>16 substances at different times, sir. 09:30:51</p> <p>17 QUESTIONS BY MR. KO: 09:30:52</p> <p>18 Q. Okay. Going back to your 09:30:53</p> <p>19 current position as director of controlled 09:30:57</p> <p>20 substance compliance -- 09:31:01</p> <p>21 A. Sorry. 09:31:02</p> <p>22 Q. That's okay. 09:31:03</p> <p>23 -- when did you become 09:31:05</p> <p>24 director? 09:31:07</p> <p>25 A. Within the last six months. 09:31:08</p>	<p>1 Q. And who reports to you? 09:31:57</p> <p>2 A. I have two direct reports. 09:31:58</p> <p>3 They are managers of controlled substances 09:32:01</p> <p>4 compliance. 09:32:04</p> <p>5 Q. And who are they? 09:32:07</p> <p>6 A. There's a gentleman named -- 09:32:07</p> <p>7 his name is Dave Hunter. 09:32:10</p> <p>8 Q. And who is the other person? 09:32:14</p> <p>9 You said there were two? 09:32:17</p> <p>10 A. Eileen Spaulding. 09:32:17</p> <p>11 Q. Okay. And you have worked with 09:32:19</p> <p>12 Mr. Hunter and Ms. Spaulding before, correct? 09:32:21</p> <p>13 A. Correct. 09:32:24</p> <p>14 Q. And you worked with them in 09:32:25</p> <p>15 connection with the controlled substance 09:32:26</p> <p>16 compliance team throughout the time you were 09:32:30</p> <p>17 senior manager, correct? 09:32:31</p> <p>18 A. Correct. 09:32:32</p> <p>19 (Mallinckrodt-Harper Exhibit 1 09:32:40</p> <p>20 marked for identification.) 09:32:40</p> <p>21 QUESTIONS BY MR. KO: 09:32:40</p> <p>22 Q. I'd like to hand you an 09:32:41</p> <p>23 exhibit. Go ahead and mark this as Harper 09:32:42</p> <p>24 Exhibit 1. 09:32:56</p> <p>25 And there's no Bates on this, 09:33:09</p>
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<p>1 Q. Okay. So fairly recently? 09:31:11</p> <p>2 A. Yes, sir. 09:31:12</p> <p>3 Q. And before that, you were 09:31:13</p> <p>4 senior manager of controlled substance 09:31:15</p> <p>5 compliance, correct? 09:31:17</p> <p>6 A. Yes. 09:31:18</p> <p>7 Q. Okay. And so was this 09:31:18</p> <p>8 considered a promotion? 09:31:20</p> <p>9 A. Yes. 09:31:21</p> <p>10 Q. Okay. And who did you replace, 09:31:22</p> <p>11 if at all? If anyone? 09:31:25</p> <p>12 A. No one. 09:31:27</p> <p>13 Q. So was this position created 09:31:28</p> <p>14 for you? 09:31:30</p> <p>15 A. Yes. 09:31:30</p> <p>16 Q. Okay. And what were the 09:31:31</p> <p>17 circumstances of creating this position? 09:31:34</p> <p>18 A. It was an evolution, if you 09:31:36</p> <p>19 will, of my -- my existing job 09:31:39</p> <p>20 responsibilities that merited a different 09:31:43</p> <p>21 title. 09:31:46</p> <p>22 Q. Okay. And now that you're 09:31:46</p> <p>23 director, do you have people that report to 09:31:55</p> <p>24 you? 09:31:56</p> <p>25 A. Yes. 09:31:56</p>	<p>1 but this -- this appears to be a printout of 09:33:12</p> <p>2 your LinkedIn profile; is that correct? 09:33:14</p> <p>3 A. Yes. 09:33:16</p> <p>4 Q. And does that appear to be an 09:33:16</p> <p>5 accurate reflection or copy of your LinkedIn 09:33:19</p> <p>6 profile? 09:33:23</p> <p>7 A. Yes. 09:33:23</p> <p>8 Q. And I don't want to spend too 09:33:23</p> <p>9 much time on it, but I do want to ask you a 09:33:25</p> <p>10 question about your involvement in the 09:33:27</p> <p>11 National Association of Drug Diversion 09:33:33</p> <p>12 Investigators. 09:33:36</p> <p>13 Do you see that reference? I 09:33:37</p> <p>14 believe that's on the next page. 09:33:38</p> <p>15 A. Yes, I see it. Yes. 09:33:43</p> <p>16 Q. And it indicates that you've 09:33:44</p> <p>17 been a member of the NADDI since 2013? 09:33:46</p> <p>18 A. Yes. 09:33:50</p> <p>19 Q. What is the NADDI? 09:33:51</p> <p>20 A. It's a group -- it's a 09:33:54</p> <p>21 consortium of industry, law enforcement 09:34:00</p> <p>22 leaders that assemble to discuss the issues 09:34:05</p> <p>23 around diversion. 09:34:10</p> <p>24 Q. Okay. And diversion of 09:34:12</p> <p>25 controlled substances? 09:34:14</p>